

23-ERIK K. SWANHOLT, CA Bar No. 198042
eswanholt@foley.com

JESSICA N. WALKER, CA Bar No. 275398
jwalker@foley.com

FOLEY & LARDNER LLP

555 SOUTH FLOWER STREET, SUITE 3300
LOS ANGELES, CA 90071-2418
TELEPHONE: 213.972.4500
FACSIMILE: 213.486.0065

JORDAN C. BLEDSOE (*Pro Hac Vice Pending*)
jordan.bledsoe@foley.com

FOLEY & LARDNER LLP

95 S. STATE STREET, SUITE 2500
SALT LAKE CITY, UT 84111
TELEPHONE: 801.401.8900
FACSIMILE: 385.799.7576

Attorneys for Defendants
CRUMBL LLC, CRUMBL, IP, LLC, and
CRUMBL FRANCHISING, LLC

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

LISA WATSON, and ANGELA KEERS,
individually and on behalf of all those
similarly situated,

Plaintiffs,

vs.

CRUMBL LLC, CRUMBL, IP, LLC, and
CRUMBL FRANCHISING, LLC,
Defendants.

Case No. 2:23-cv-01770-DJC-CKD

**STIPULATION TO EXTEND CASE
DEADLINES, INCLUDING DEADLINE TO
SUBMIT JOINT STATUS REPORT; ORDER**

Complaint Filed: August 21, 2023

Judge Daniel J. Calabretta

STIPULATION TO EXTEND CASE DEADLINES, INCLUDING DEADLINE TO SUBMIT
JOINT STATUS REPORT; ORDER
Case No. 2:23-cv-01770-DJC-CKD

1 Plaintiffs LISA WATSON and ANGELA KEERS (“Plaintiffs”) and Defendants CRUMBL
2 LLC, CRUMBL IP, LLC, and CRUMBL FRANCHISING, LLC (“Defendants”), by and through
3 their undersigned counsel, and pursuant to Civil Local Rule 144, respectfully submit this
4 Stipulation to Extend Case Deadlines, Including Deadline to Submit Joint Status Report.

5 **WHEREAS**, Plaintiffs filed their Complaint in the above-captioned action (the
6 “Complaint”);

7 **WHEREAS**, on September 6, 2023, Plaintiffs and Defendants stipulated to a 21-day
8 extension of the earliest deadline to respond to the Complaint by answer or motion, pursuant
9 to Civil Local Rule 144(a), providing Defendants up to and including October 4, 2023 to file and
10 serve their response to Plaintiffs’ Complaint;

11 **WHEREAS**, on October 2, 2023, Plaintiffs and Defendants stipulated to an additional
12 30-day extension of the October 4, 2023 deadline to respond to the Complaint by answer or
13 motion;

14 **WHEREAS**, on October 3, 2023, the Court granted this extension, setting Defendants’
15 deadline to respond to the Complaint by answer or motion for November 3, 2023;

16 **WHEREAS**, pursuant to the Court’s Initial Case Management Order, within sixty days of
17 the service of any party, the parties are required to confer as required by Federal Rule of Civil
18 Procedure 26(f) and to prepare and submit to the Court a joint status report that includes the
19 Rule 26(f) discovery plan;

20 **WHEREAS**, based on the service of the Complaint and Summons on August 23, 2023
21 on CRUMBL IP, LLC, the deadline for the Parties to confer and to submit their joint status
22 report is currently October 23, 2023;

23 **WHEREAS**, the Parties have been discussing possible resolution of the case since
24 September 28, 2023, when the Parties conferred regarding Defendants’ proposed motion in
25 response to the Complaint;

26 **WHEREAS**, since then, the Parties have engaged in additional discussions regarding
27 resolution, have begun informal discovery directed towards settlement, and are discussing
28 scheduling a mediation before a private mediator;

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1 **WHEREAS**, the Parties have agreed and stipulate to Plaintiffs filing an amended
2 complaint by October 31, 2023;

3 **WHEREAS**, the Parties have agreed and stipulate to set Defendants' deadline to
4 respond to the amended complaint by motion or answer as forty-five (45) days after the service
5 of the amended complaint;

6 **WHEREAS**, the Parties wish to stipulate to extend the deadline to confer pursuant to
7 Rule 26(f) and to submit the joint status report from October 23, 2023 to thirty (30) days after a
8 ruling on Defendants' motion to dismiss or after Defendants' answer is filed, whichever is later;

9 **WHEREAS**, good cause exists for these extensions because Plaintiffs and Defendants
10 are continuing to explore potential resolution of the case, and have made progress in the form
11 of agreeing to permit Plaintiffs to amend their complaint and in engaging in informal discovery;

12 **WHEREAS**, the parties agree that further discussions regarding resolution of the case
13 would be productive, as would continuing with informal discovery and mediation;

14 **WHEREAS**, this is the third time the parties have agreed to an extension, and the first
15 time such stipulation alters the date of any event or deadline already fixed by Court order;

16 **WHEREAS**, this stipulation does alter the date of the deadline to submit a joint status
17 report currently fixed by Court order, extending it from October 23, 2023 to thirty (30) days
18 after a ruling on Defendants' motion to dismiss or after Defendants' answer is filed, whichever
19 is later;

20 **WHEREAS**, no dates have yet been set for the discovery cutoff date, the last date for
21 hearing motions, the pre-trial conference date, or the trial date;

22 **NOW, HEREBY, THE PARTIES STIPULATE AND AGREE** that:

- 23 1. Plaintiffs shall have up to and including October 31, 2023 to file and serve their
24 amended complaint;
- 25 2. Defendants shall have up to and including forty-five (45) days from service of the
26 amended complaint to file and serve their response by motion or answer to the
27 amended complaint;
- 28 3. The parties shall have up to and including thirty (30) days from a ruling on

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Defendants' motion to dismiss, or from the date of filing of Defendants' answer, whichever is later, to confer on the Rule 26(f) topics and to submit a joint status report to the Court.

IT IS SO STIPULATED AND AGREED.

DATED: October 19, 2023

**MILBERG COLEMAN BRYSON PHILLIPS
GROSSMAN LLP**

Alex R. Straus
Erin Ruben
Harper T. Segui
Rachel Soffin

/s/ Erin Ruben (as authorized on Oct. 19, 2023)

Erin Ruben
Attorneys for Plaintiffs
LISA WATSON and ANGELA KEERS

DATED: October 19, 2023

FOLEY & LARDNER LLP

Erik K. Swanholt
Jessica N. Walker
Jordan C. Bledsoe

/s/ Jessica N. Walker

Jessica N. Walker
Attorneys for Defendants
CRUMBL LLC, CRUMBL IP, LLC, and
CRUMBL FRANCHISING, LLC

IT IS SO ORDERED.

DATED: October 19, 2023

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE

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